

# Exhibit 1

**Subject:** Re: FW: Pedersen v. Zoho SECOND Status Report  
**Date:** Monday, June 24, 2024 at 10:30:15 AM Pacific Daylight Time  
**From:** Joseph Zito  
**To:** Ryan Marton, Darryl Adams  
**CC:** Phil Haack, Erik Lund, Elsbeth Norman

Currently, Mr. Ramey remains counsel. That decision is in the hands of Mr. Pedersen and Mr. Ramey. I will let them know of the current status. It may be that Mr. Pedersen intends to reengage Mr. Ramey as counsel moving forward. I am not privy to that decision.

Joseph J. Zito  
DNL ZITO  
1250 Connecticut Avenue, NW  
Suite 700  
Washington, DC 20036  
202-466-3500  
[jzito@dnlzito.com](mailto:jzito@dnlzito.com)

On 6/24/2024 1:26 PM, Ryan Marton wrote:

Joseph,

You filed the defective withdrawal of Ramey – which was rejected. Someone from your side (Pedersen, Ramey or you) should clean that up so it is clear who is counsel of record for plaintiff.

Thanks,  
Ryan

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**From:** Joseph Zito <[jzito@dnlzito.com](mailto:jzito@dnlzito.com)>  
**Date:** Monday, June 24, 2024 at 9:59 AM  
**To:** Ryan Marton <[ryan@martonribera.com](mailto:ryan@martonribera.com)>, Darryl Adams <[dadams@sgbfirm.com](mailto:dadams@sgbfirm.com)>  
**Cc:** Phil Haack <[phaack@martonribera.com](mailto:phaack@martonribera.com)>, Erik Lund <[elund@whitestone.law](mailto:elund@whitestone.law)>, Elsbeth Norman <[enorman@whitestone.law](mailto:enorman@whitestone.law)>  
**Subject:** Re: FW: Pedersen v. Zoho SECOND Status Report

Thank you for noting the typos.

Mr. Ramey is responsible for his withdrawal or lack thereof..

Joseph J. Zito  
DNL ZITO  
1250 Connecticut Avenue, NW  
Suite 700  
Washington, DC 20036  
202-466-3500  
[jzito@dnlzito.com](mailto:jzito@dnlzito.com)

On 6/24/2024 12:13 PM, Ryan Marton wrote:

Jospeh,

We do not oppose your withdrawal from the case. However, we do oppose any further stay of the case. In addition, the caption of your proposed motion incorrectly states that the case is in the Waco Division. Our case is in the Austin Division. Also, the case number is wrong in your caption. Our case number is 1:23-cv-00071. Also, your termination of Ramey in January was rejected, so technically he is still counsel of record. You may want to correct that before you withdraw.

Please let me know if you would like to discuss.

Thanks,  
Ryan

Ryan Marton  
Marton Ribera Schumann & Chang LLP  
martonribera.com  
415.827.1712

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**From:** Joseph Zito <[jzito@dnlzito.com](mailto:jzito@dnlzito.com)>  
**Date:** Monday, June 24, 2024 at 2:09 AM  
**To:** Ryan Marton <[ryan@martonribera.com](mailto:ryan@martonribera.com)>, Darryl Adams <[dadams@sgbfirm.com](mailto:dadams@sgbfirm.com)>  
**Cc:** Phil Haack <[phaack@martonribera.com](mailto:phaack@martonribera.com)>, Erik Lund <[elund@whitestone.law](mailto:elund@whitestone.law)>, Elsbeth Norman <[enorman@whitestone.law](mailto:enorman@whitestone.law)>  
**Subject:** Re: FW: Pedersen v. Zoho SECOND Status Report

Counsel, please let me know if you have any opposition to the filing of my attached Motion to withdraw.

We intend to file tomorrow Tuesday June 25.

Joseph J. Zito  
DNL ZITO  
1250 Connecticut Avenue, NW  
Suite 700  
Washington, DC 20036  
202-466-3500  
[jzito@dnlzito.com](mailto:jzito@dnlzito.com)

On 6/21/2024 9:17 AM, Joseph Zito wrote:

Please use my primary e-mail: [jzito@dnlzito.com](mailto:jzito@dnlzito.com) for

all future communications.

My whitestone law e-mail is being retired on July 31.

Is Zoho agreeable to file the joint status report?

Joseph J. Zito  
DNL ZITO  
1250 Connecticut Avenue, NW Suite 700  
Washington, DC 20036  
202-466-3500  
[jzito@dnlzito.com](mailto:jzito@dnlzito.com)

On 6/20/2024 11:09 AM, Ryan Marton wrote:

Joseph,

Thanks for your email. Zoho is not willing to pay  
any money to settle this case.

Best,  
Ryan

Ryan Marton  
Marton Ribera Schumann & Chang LLP  
martonribera.com  
415.827.1712

---

**From:** Joseph J. Zito  
<[jzito@whitestone.law](mailto:jzito@whitestone.law)>  
**Date:** Wednesday, June 19, 2024 at 8:25 AM  
**To:** Ryan Marton  
<[ryan@martonribera.com](mailto:ryan@martonribera.com)>, Elsbeth  
Norman <[enorman@whitestone.law](mailto:enorman@whitestone.law)>,  
Darryl Adams <[dadams@sgbfirm.com](mailto:dadams@sgbfirm.com)>  
**Subject:** Re: FW: Pedersen v. Zoho  
SECOND Status Report

Counsel:

Mr. Pedersen has made a determination on  
proceeding against Zoho.

Mr. Pedersen has requested that we contact you one last time in a final effort to resolve this matter without the need to reopen the litigation. Mr. Pedersen is willing to accept \$75,000 in full resolution, past and future, with some of the current defendants so that fewer cases need to be taken to trial. We need to hear back from you as soon as possible and to try and get this matter resolved before July 12. We look forward to discussions with you regarding resolution.

We have attached a Status Report for your review to reflect the current determination and to maintain the stay through August 15. Please let us have any comments or red-lines so that we can get this status report filed shortly.

Joseph J. Zito  
WHITESTONE LAW  
Suite 550  
1850 Towers Crescent Plaza  
Tysons, Virginia 22182  
[jzito@whitestone.law](mailto:jzito@whitestone.law)  
202-466-3500

On 5/23/2024 11:57 PM, Ryan Marton wrote:

Elsbeth and Joseph, It looks like you filed one of the earlier versions of the joint status report. Can you file the amended one reflecting what we agreed to be filed (attached). Thanks, Ryan

---

**From:** Ryan Marton  
[<ryan@martonribera.com>](mailto:ryan@martonribera.com)  
**Date:** Thursday, May 23, 2024 at 12:53 PM  
**To:** Elsbeth Norman  
[<enorman@whitestone.law>](mailto:enorman@whitestone.law),  
[dadams@sgbfirm.com](mailto:dadams@sgbfirm.com)  
[<dadams@sgbfirm.com>](mailto:dadams@sgbfirm.com)  
**Cc:** Joseph J. Zito  
[<jzito@dnlzito.com>](mailto:jzito@dnlzito.com)  
**Subject:** Re: Pedersen v. Zoho  
Joint Status Report

Elsbeth, one more edit in the

attached. You can file this one –  
not the earlier versions. Thanks,  
Ryan

---

**From:** Ryan Marton  
[<ryan@martonribera.com>](mailto:ryan@martonribera.com)  
**Date:** Thursday, May 23, 2024 at  
11:24 AM  
**To:** Elsbeth Norman  
[<enorman@whitestone.law>](mailto:enorman@whitestone.law),  
[dadams@sgbfirm.com](mailto:dadams@sgbfirm.com)  
[<dadams@sgbfirm.com>](mailto:dadams@sgbfirm.com)  
**Cc:** Joseph J. Zito  
[<jzito@dnlzito.com>](mailto:jjzito@dnlzito.com)  
**Subject:** Re: Pedersen v. Zoho  
Joint Status Report

Elsbeth, one more edit in the  
attached. You can file this one –  
not the earlier version. Thanks,  
Ryan

---

**From:** Ryan Marton  
[<ryan@martonribera.com>](mailto:ryan@martonribera.com)  
**Date:** Thursday, May 23, 2024 at  
11:14 AM  
**To:** Elsbeth Norman  
[<enorman@whitestone.law>](mailto:enorman@whitestone.law),  
[dadams@sgbfirm.com](mailto:dadams@sgbfirm.com)  
[<dadams@sgbfirm.com>](mailto:dadams@sgbfirm.com)  
**Cc:** Joseph J. Zito  
[<jzito@dnlzito.com>](mailto:jjzito@dnlzito.com)  
**Subject:** Re: Pedersen v. Zoho  
Joint Status Report

Elsbeth,

Zoho's edits are in redline.

With these you can file.

Thanks,  
Ryan

Ryan Marton  
Marton Ribera Schumann & Chang  
LLP  
martonribera.com  
415.827.1712

---

**From:** Elsbeth Norman  
<[enorman@whitestone.law](mailto:enorman@whitestone.law)>  
**Date:** Thursday, May 23, 2024 at  
8:38 AM  
**To:** [dadams@sgbfirm.com](mailto:dadams@sgbfirm.com)  
<[dadams@sgbfirm.com](mailto:dadams@sgbfirm.com)>, Ryan  
Marton  
<[ryan@martonribera.com](mailto:ryan@martonribera.com)>,  
Shannon Kumagai  
<[shannonkumagai@martonribera.com](mailto:shannonkumagai@martonribera.com)>  
**Cc:** Joseph J. Zito  
<[jjzito@dnlzito.com](mailto:jjzito@dnlzito.com)>  
**Subject:** Pedersen v. Zoho Joint  
Status Report

Counsel,

Please review the attached  
proposed Joint Status Report  
and add your signature blocks  
and any redlines you may have  
then let us know if it is  
acceptable to file.

Sincerely,

**Elsbeth Norman**  
Paralegal  
Whitestone Law, PLLC  
1850 Towers Crescent Plaza | Suite  
550  
Tysons, VA 22182  
T: +1 (703) 261-9101  
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